

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO,
et al.,

Plaintiffs,

v.

STATE OF TEXAS, et al.,

Defendants.

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Civil Action No. 5:21-CV-0844-XR
(Consolidated Cases)

**LUPE PLAINTIFFS’
DESIGNATION OF TESTIFYING EXPERTS**

Pursuant to Federal Rule of Civil Procedure 26(a)(2) and the Court’s Scheduling Order (Dkt. No. 125), as amended by the Stipulated Extension of Expert Discovery Deadline (Dkt. No. 209), Plaintiffs La Unión del Pueblo Entero, Friendship-West Baptist Church, the Anti-Defamation League Austin, Southwest, and Texoma Regions, Southwest Voter Registration Education Project, Texas Impact, Mexican American Bar Association of Texas, Texas Hispanics Organized for Political Education, Jolt Action, William C. Velasquez Institute, FIEL Houston Inc., and James Lewin (“Plaintiffs”), hereby file their designation of testifying experts.

Designation of Testifying Experts

1. **Dr. Andres Tijerina.** Dr. Tijerina is an Associate Professor of U.S. History in the History Department at Austin Community College. Dr. Tijerina is expected to provide testimony regarding the history of Latino and Anglo relations in Texas.
2. **Dr. Henry Flores.** Dr. Flores is a Professor Emeritus in the Department of Political Science at St. Mary’s University. He is a nationally recognized litigation research expert in racial discrimination against and the voting rights of Latinos. Dr. Flores is expected to testify regarding whether the enactment of SB 1 was characterized by discriminatory racial intent.

3. **Dr. Douglas L. Kruse.** Dr. Kruse is a Distinguished Professor in the Rutgers School of Management and Labor Relations and Co-Director Program for Disability Research. Dr. Kruse is expected to provide testimony on the ways in which SB 1 erects barriers that harm voters with disabilities by impeding their access to voting in the State of Texas.

Also pursuant to this Court's November 18, 2021 Scheduling Order, Plaintiffs shall on this day serve on all parties, but not file, the materials required by Federal Rule of Civil Procedure 26(a)(2)(B).

Dated: February 28, 2022

Respectfully submitted,

/s/ Nina Perales

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on February 28, 2022, and that all counsel of record were served by CM/ECF.

/s/ Nina Perales
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